

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UMG RECORDINGS, INC, CAPITOL
RECORDS, LLC, CONCORD BICYCLE
ASSETS, LLC, CMGI RECORDED MUSIC
ASSETS LLC, SONY MUSIC
ENTERTAINMENT, and ARISTA MUSIC

Plaintiffs,

v.

INTERNET ARCHIVE, BREWSTER
KAHLE, KAHLE/AUSTIN FOUNDATION,
GEORGE BLOOD, and GEORGE BLOOD,
L.P.

Defendant.

Civil Action No. 23-cv-7133 (LGS)

**DECLARATION OF COREY MILLER IN SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION TO TRANSFER VENUE**

I, Corey Miller, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate at Oppenheim + Zebrak, LLP ("O+Z"), which represents Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music (collectively, "Plaintiffs") in the above-captioned case.

2. I submit this declaration in support of Plaintiffs' Opposition to Defendants' Motion to Transfer Venue. I have knowledge of the facts stated herein based on personal knowledge and my review of the documents and other items referenced herein. If called upon to do so, I am able to testify competently to the matters set forth below.

3. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs' Initial Disclosures served on November 1, 2023.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Defendants Internet Archive, Brewster Kahle, George Blood, and George Blood L.P.'s Initial Disclosures served on November 1, 2023.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Defendants Kahle/Austin Foundation's Initial Disclosures served on November 1, 2023.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a printout from Amtrak showing trains from Philadelphia, PA (PHL) to New York, NY (NYP) taking approximately one hour and 30 minutes.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a printout from Google Flights showing flights from Philadelphia, PA (PHL) to San Francisco, CA (SFO) taking approximately 6 hours.

8. Attached hereto as **Exhibit 6** is a true and correct copy of the webpage located at <https://www.georgeblood.com/references>.

9. Attached hereto as **Exhibit 7** is a true and correct copy of the webpage located at <https://www.georgeblood.com/projects>.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Corey Miller
COREY MILLER

Executed on this 15th day of November 2023.